

IN RE: DONALD L. DENNIS, JR. and : CHAPTER 13  
ANNETTE M. DENNIS :  
Debtor(s) :  
 :  
CHARLES J. DEHART, III :  
STANDING CHAPTER 13 TRUSTEE :  
 :  
vs. :  
 :  
DONALD L. DENNIS, JR. and :  
ANNETTE M. DENNIS :  
Respondent(s) : CASE NO. 1-17-bk-01313

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 19<sup>th</sup> day of July, 2017, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Tracy Updike, Esquire  
2080 Linglestown Road, Suite 201  
Harrisburg, PA 17110

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee